

Highly Confidential - Attorneys' Eyes Only

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ORACLE AMERICA, INC.,)
Plaintiff,)
vs.) No. CV 10-03561 WHA
GOOGLE, INC.,) VOLUME I
Defendant.)

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

Videotaped Deposition of NOEL POORE,
taken at 42 Chauncy Street, Boston,
Massachusetts, commencing at 2:05 p.m.,
Wednesday, September 7, 2011, before
Jill Shepherd, RPR, MA-CSR No. 148608,
NH-CSR No. 128, CA-CSR No. 13275, CLR,
and Notary Public.

PAGES 1 - 95

Page 1

Veritext National Deposition & Litigation Services
866 299-5127

EXHIBIT 2-12

Highly Confidential - Attorneys' Eyes Only

1	discussed my report with Mr. Vandette.	14:36:07
2	Q. Did you discuss your report with Erez	14:36:11
3	Landau?	14:36:17
4	MS. AGRAWAL: Objection. Form.	14:36:18
5	A. No.	14:36:19
6	Q. Did you discuss your report with Seeon	14:36:19
7	Birger?	14:36:22
8	MS. AGRAWAL: Objection. Form.	14:36:22
9	A. No.	14:36:23
10	Q. Anyone else you discussed your report with	14:36:24
11	other than Professor Mitchell and	14:36:30
12	Mr. Kessler?	14:36:32
13	MS. AGRAWAL: Objection. Form.	14:36:33
14	A. I don't recall discussing it with anyone	14:36:33
15	else, no.	14:36:39
16	Q. Did you discuss it with some attorneys; is	14:36:39
17	that correct?	14:36:43
18	MS. AGRAWAL: And I caution -- I	14:36:43
19	instruct the witness -- caution the witness	14:36:44
20	not to reveal attorney-client privileged	14:36:46
21	communications; but to the extent you can	14:36:48
22	answer the question with a yes or no, you	14:36:50
23	can answer.	14:36:52
24	A. Yes, I have. I have discussed the report	14:36:53
25	with attorneys, yes.	14:36:56

Page 24